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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,	)	<b>2:15-CR-245-JCM-NJK</b>
	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
JORGE MONTESINOS-CAMPOS,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATION FOR EXTENSION OF TIME**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Paul D. Riddle, Assistant Federal Public Defender, counsel for Defendant JORGE MONTESINOS-CAMPOS, that the date for the Government to file a response to the Defendant's Motion to Suppress (Docket #27) be extended for two (2) weeks.

This stipulation is entered for the following reasons:

1. On February 3, 2016, the Defendant filed a Motion to Suppress. *See* Docket #27. Pursuant to the Court's Order, the Government's response deadline is March 28, 2016. *See* Docket #36

2. Since the filing of the last stipulation, the parties have reached an agreement to resolve this case, and the Government has tendred a written plea agreement consistent with the

1 agreement reached between the parties. Said agreement will obviate the need for the  
2 Government to respond to the Defendant's Motion. Counsel for the Defendant needs additional  
3 time to present the written plea offer to the Defendant.

4 3. The Defendant is incarcerated, but he does not object to the continuance of the  
5 Government's response deadline.

6 4. The additional time requested herein is not sought for purposes of delay, but  
7 merely to allow the parties an opportunity to resolve this case, which would obviate the need for  
8 further litigation.

9 5. Additionally, denial of this request for continuance could result in a miscarriage  
10 of justice.

11 6. This is the fourth stipulation filed herein to continue the Government's response  
12 deadline.

13 DATED: March 28, 2016.

14  
15 /s/  
PHILLIP N. SMITH, JR.  
16 Assistant United States Attorney  
Counsel for the United States

15 /s/  
PAUL D. RIDDLE.  
Assistant Federal Public Defender  
Counsel for Defendant JORGE MONTESINOS

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,	)	<b>2:15-CR-245-JCM-NJK</b>
	)	
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Plaintiff,	)	
	)	
v.	)	
	)	
JORGE MONTESINOS-CAMPOS,	)	
	)	
Defendant.	)	

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**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On February 3, 2016, the Defendant filed a Motion to Suppress. *See* Docket #27. Pursuant to the Court's Order, the Government's response deadline is March 28, 2016. *See* Docket #36

2. Since the filing of the last stipulation, the parties have reached an agreement to resolve this case, and the Government has tendred a written plea agreement consistent with the agreement reached between the parties. Said agreement will obviate the need for the Government to respond to the Defendant's Motion. Counsel for the Defendant needs additional time to present the written plea offer to the Defendant.

3. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the parties an opportunity to resolve this case, which would obviate the need for further litigation.

1           5.       Additionally, denial of this request for continuance could result in a miscarriage  
2 of justice.

3           6.       This is the fourth stipulation filed herein to continue the Government's response  
4 deadline.

5           For all of the above-stated reasons, the ends of justice would best be served by a  
6 continuance of the motion response deadline.

7                               **CONCLUSIONS OF LAW**

8           The additional time requested herein is not sought for purposes of delay, but merely to  
9 allow the parties an opportunity to resolve this case, which would obviate the need for further  
10 litigation. The failure to grant said continuance would likely result in a miscarriage of justice.

11                               **ORDER**

12           IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for the  
13 Government to respond to the Defendant's Motion to Suppress (Docket #27) is extended until  
14 April 11, 2016.

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18                               UNITED STATES MAGISTRATE JUDGE  
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